

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATE OF AMERICA

v.

JOHN ALVES

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) Criminal No. 13-10017-JLT
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**ASSENTED-TO MOTION TO MODIFY DEFENDANT JOHN ALVES'
CONDITIONS OF RELEASE**

Defendant John Alves hereby moves through undersigned counsel to modify his conditions of release so that he may reside at 35 Woodward Avenue, Roxbury, MA 02119. As grounds for this motion, Mr. Alves states that his longtime girlfriend gave birth to their first child on May 11, 2013. On May 6, 2013, his 73-year old father underwent triple bypass surgery. Mr. Alves's father and newborn daughter each returned home on May 13, 2013. Mr. Alves' girlfriend and daughter are residing in his former apartment on the first floor of his parent's home at 35 Woodward Avenue. His parents reside on the second floor. His mother is 72 years of age. Mr. Alves's father is still recovering from surgery. He has limited mobility and is under doctors' orders not to exert himself in any way.

Based on the foregoing, Mr. Alves moves to modify his conditions of release to allow him to reside in his old apartment at 35 Woodward Avenue with his girlfriend and daughter so

that he can attend to his daughter's childcare on an ongoing basis and assist his parents with their daily activities and household demands.

Counsel for Mr. Alves has conferred with the government regarding this matter and they assent to this motion.

Dated: June 10, 2013

/s/ Emily R. Schulman
Emily R. Schulman (BBO # 566374)
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CERTIFICATE OF SERVICE

I, Emily Schulman, hereby certify that a true and accurate copy of this document was served via ECF on June 10, 2013 to all registered participants as identified on the Notice of Electronic Filing.

/s/ Emily R. Schulman
Emily R. Schulman